

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

In re:	Chapter 11
ABERDEEN ENTERPRISES, INC., BRICKCHURCH ENTERPRISES, INC.,	Case No. 8-23-72834-AST Case No. 8-22-70914-AST
Debtors.	Jointly Administered
	Date: January 5, 2024 Time: 9:30 a.m. Place: 290 Federal Plaza, Court 960 Central Islip, New York

**5 WORLD MARKET TICKETS & HUMANITY CONCERT 'S NOTICE
OF MOTION AND MOTION FOR ORDER APPROVING SALE OF ABERDEEN
ENTERPRISES AND BRICKCHURCH ENTERPRISES TO 5 WORLD MARKET
TICKETS AND HUMANITY CONCERT FOR \$150,000,000 IN CASH; INLCUDING
ASSUMPTION OF ALL OUTSTANDING DEBTS TO BE PAID OFF IN CASH AND
ALL ATTORNEYS' FEES PAID BY THE BUYER; SUPPORTING MEMORANDUM OF
POINTS AND AUTHORITIES**

Note: 5 WORLD MARKET TICKETS and HUMANITY CONCERT will not be interested in participating in any auction sale of properties owned by Aberdeen and Brickchurch. This motion is filed pursuant to section 363 to pay \$150,000,000 in cash to purchase Aberdeen Enterprises and Brickchurch Enterprises in order to become the owners of the real estate assets owned by the entities and assumption of all outstanding debts and attorneys' fees via proceeds from our pending \$5,000,000,000 Convertible Promissory Note under case number 2:23-cv-02541 in the United States District Court for the Eastern District of California, \$1,000,000,000,000 144A Notes and IPO (Initial Public Offering).

NOTICE OF MOTION AND MOTION

PLEASE TAKE NOTICE that on January 5, 2024, at 9:30 a.m. or as soon as thereafter as the matter may be heard in the Courtroom of the Honorable Alan Trust, located at 290 Federal Plaza, Courtroom 960, Central Islip, New York, 5 World Market Tickets and Humanity Concert, the buyer, in conjunction with Dream Yard Landscaping, the creditor in the above captioned Chapter 11 case (“Aberdeen Enterprises, Inc.” and “Brickchurch Enterprises, Inc.”), will and hereby does move the Court (the “Motion”) for entry of an order authorizing the purchase of Aberdeen Enterprises, Inc. and Brickchurch Enterprises, Inc. by 5 World Market Tickets and Humanity Concert for \$150,000,000 in cash, including assumption of all outstanding debts owed to creditors to be paid in full in cash and satisfaction of all pending liens.

This Motion is made pursuant to Sections 363(b) and 363(p)(1)(2) of the United States Bankruptcy Code (11 U.S.C. §§363(b) and (p)(1)(2)) and is based on the facts and law set forth herein (including the accompanying Memorandum of Points and Authorities beginning on the next page hereof) and the Declaration of Adesijuola O. Ogunjobi.

Louise Blouin, the principal owner of Aberdeen Enterprises, Inc., and Brickchurch Enterprises, Inc., should take special notice the relief requested in the Motion pursuant to 11 U.S.C. §§363(b) and (p)(1)(2), to pay her \$150,000,000 in cash to purchase Aberdeen Enterprises, Inc. and Brickchurch Enterprises, Inc., with assumption of all outstanding debts paid off in cash and all attorneys’ fees also paid by the buyer must allow buyer to close its pending \$5,000,000,000 Convertible Promissory Notes, \$1,000,000,000,000 144A Notes, IPO as outlined inside the documents filed under case number 2:23-cv-02541-TLN-DB in the United States District Court for the Eastern District of California Sacramento Division. It is customary for any party to raise capital under capitalism, period. One of the creditors of this pending bankruptcy

case, Bay Point Capital Partners II, LP raised \$320,234,839 in cash on August 31, 2022 via filing of Form D-Notice of Exempt Offering of Securities with the United States Securities and Exchange Commission.

Louise Blouin has tried to unload the properties owned by Aberdeen and Brickchurch since 2016 and today, still trying. It is like watching rerun of a bad movie, same result. So, the patience to allow this buyer to close its own capital raising activity to purchase and pay off all outstanding debts is not what Louise Blouin can pass on based on this motion.